



## **DECLARATION OF JON ABBOTT**

**COMES NOW**, Jon Abbott, and states as follows:

1. I am an adult male resident of the State of Hawaii and reside in Honolulu County and am competent to provide this declaration. If called as a witness in this matter, I would provide the following testimony and I make this declaration based on personal knowledge, except where otherwise stated.
2. I am employed as an electrician.
3. Since the beginning of the pandemic, I have been unable to renew my permit to acquire long guns, which expired in June of 2020.
4. During the beginning of the pandemic, the Honolulu Police Department moved to an online appointment system.
5. Applicants had to make an appointment online prior to arriving at the police department to process their permits to acquire and registration of firearms.
6. I was unable to get an appointment online approved since all appointments were always taken.
7. HPD's system was only able to make appointments ninety days out from the day someone attempted to make an appointment.
8. Recently, HPD started a new walk-in system.
9. When the walk-in registration was opened on Aug 10, 2021, I was hopeful I would be able to finally purchase the firearms I had been wanting for over a year.

10. My hopes were soon dashed.

11. I found that the system HPD put in place is not a true walk-in registration, as it had been before the pandemic, but an even more cumbersome and restrictive system.

12. At the time, HPD would only process the first 50 people who showed up each day.

13. On August 19, 2021 at about 12:30 PM, I stopped by HPD to renew my permit to acquire a long gun.

14. When I went into the records office, I was advised by the clerk that if I didn't have a number, I would have to come back the following morning before 7 AM and get a number, as HPD was only taking the first 50 people each day.

15. When I pointed out there was no one in the office nor anyone outside waiting in line, he advised that there soon would be.

16. As I left, he also reminded me that the following day was Statehood Day - meaning the HPD would be closed.

17. So once again I was unable to renew my permit to acquire long guns and would have to wait another 4 days.

18. On Monday, August 23, 2021, I returned to HPD at 6:20 AM. There was already a line of about 15 people waiting. At 7 AM, two HPD officers came out

and proceeded to split the group into those who needed to complete the registration of firearms in person, or obtain a permit to acquire.

19. I was in the line to obtain a permit to acquire and was then given a number. I was told I would have to wait outside the office until my number was called.

20. This was at approximately 7:20 AM. The office did not open until 8AM. I was advised that if I was not present when my number was called, I would have to return the following morning and restart the entire process.

21. Taking off work to come down and obtain my permit as well as to register a firearm cost me money.

22. Like many tradespeople, I am not on a salary and only get paid when I perform my work.

23. Daily, I can make between \$400-\$1,000. Having to come down and waste effectively a billable day easily cost me at a minimum \$400 on the low end.

24. Having to come back in two weeks and stand in line to retrieve the permit to acquire will cost me another \$400 minimum.

25. And then bringing the firearm down to register it will cost me another \$400 minimum. This is assuming I can find jobs to fill in the remainder of each day. This is unlikely as the electrical projects I work on usually require a full day. Most likely I will have to take the entire day off which costs me about \$700. In total,

having to go through this three-day process will cost me between \$1,200 and \$2,100.

26. HPD has just announced it will be reducing the number of people they will process a day at their firearms department down to 40 starting September 7, 2021.

27. As the above example demonstrates, this registration system significantly hurts hourly workers who are usually unable to afford taking unpaid time off from work to exercise their rights.

28. On Tuesday Sept 7, 2021, I returned to HPD to pick up my Permit to Acquire Long guns. I arrived at 6:15 AM and got in line on the sidewalk outside of HPD headquarters. There were 24 people already ahead of me. At 7:05 AM several officers came out and instructed me to go to the office where I applied for the Permit to Acquire and said it would open at 8AM. This is the sign where the line starts:





29. When the office opened, I found that the actual line to pick up the Permit to Acquire was in front of the Records Office. This was really confusing as there was a second sign on the door that said "permit pickup on the other side of the records office" but no indication whether this referred to permits to acquire a long gun or for something non-firearm related.

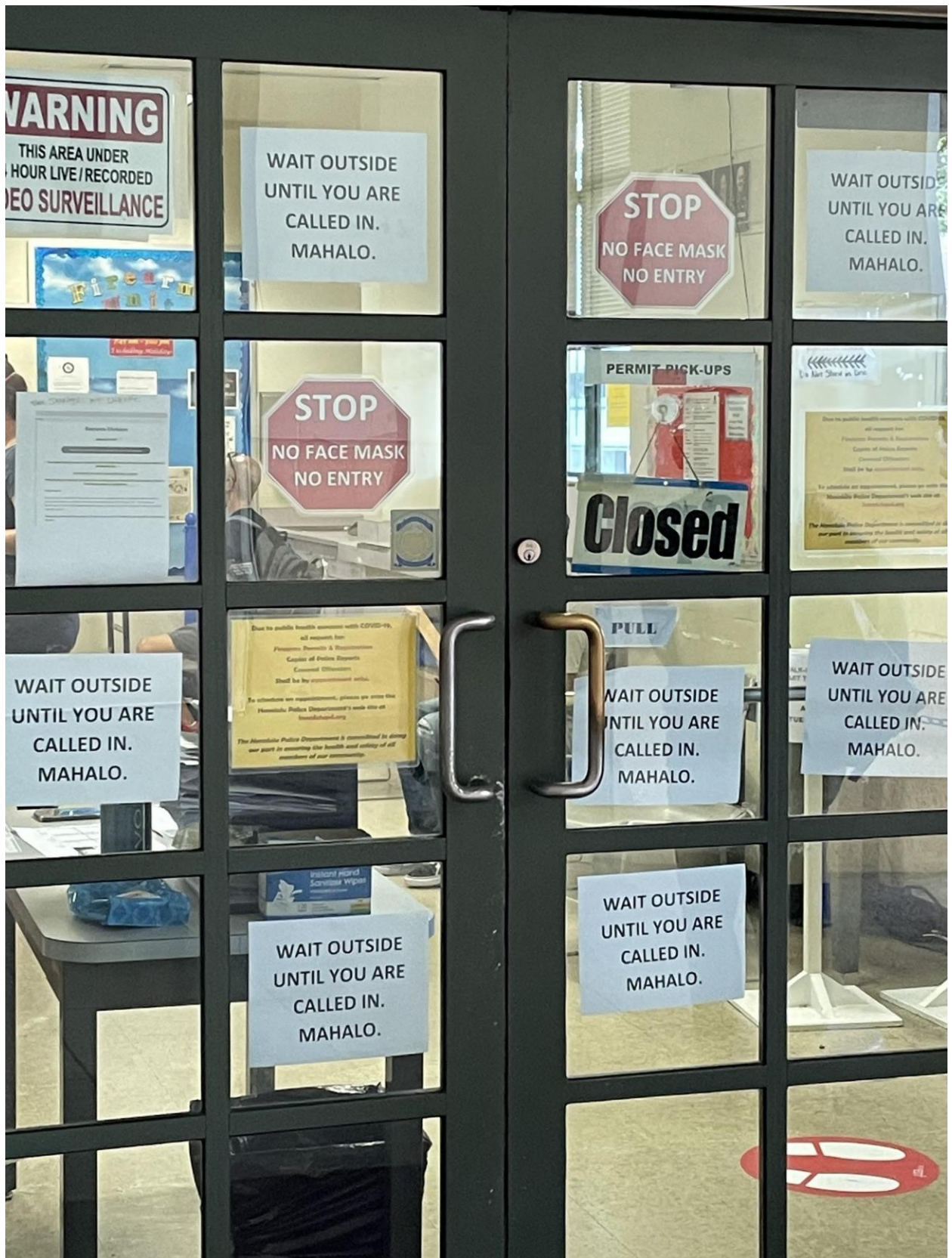
30. To add to the confusion, there was no indication on the sidewalk sign to the Records Office that Permit Pickup was located there and there was only a tiny little sign in the door window. This was easily missed since the door was constantly being opened and closed by people going into and out of the office. The photos of the signs are on the next two pages.





31.





32.

33.I have had a permit to acquire every year since 2011. Why is it necessary for me to come down a second time to pick up the permit when HPD can easily mail it to the address on the Permit itself? There were at least a dozen people who were also there to simply pick up their Permit to Acquire. This confused mess led me to cancelling my day's work, costing me \$500 on September 7, 2021 alone. Given all the lawful citizens who were also stuck there for over 2 hours, I would estimate the cost to them in the thousands of dollars in missed work.

34.In this next picture, these are firearms in cases that are literally just on the ground while people wait to register their firearms in person:





35.



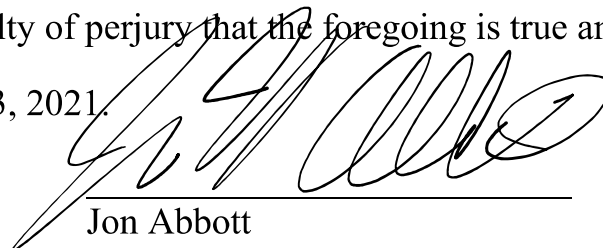
36. This Court's opinion makes it to where people don't have to wait in line with cased firearms sitting on the ground, wasting their time to register their firearms in person. Because we cannot carry firearms here, we are all sitting ducks to be robbed if a criminal decides to steal weapons that are literally sitting on the ground.

37. After the Court issued its opinion, I was very happy that I would be able to save money by not having to go in person to HPD to register a firearm I purchased, and that permits to acquire handguns would not be invalidated if I didn't have time to use it within ten days.

38. As the above pictures and my own personal stories demonstrate, Hawaii's system of in person registration and permits to acquire is in shambles, and this Court's opinion goes a long way for the average Hawaiian in restoring our rights under the Constitution. However, if the Court stays its relief until the State can appeal it, then nothing will change with respect to the current system implemented by the State and counties, and I will still be forced to lose considerable money every time I want to exercise my rights under the Constitution of the United States.

**FURTHER, DECLARANT SAYETH NAUGHT.**

I certify under penalty of perjury that the foregoing is true and correct.  
Executed on September 13, 2021.



Jon Abbott